

EXHIBIT 7

PSB’S MOTION FOR SUMMARY JUDGMENT
AND MEMORANDUM IN SUPPORT

Chad Westendorf

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ALSO PRESENT:

Chuck Habrack, Videographer

Chad Westendorf

1 that day.

2 Q On -- on December 19th --

3 A Yes.

4 Q -- you heard the word "Forge"?

5 A Yes, because they said they were sending
6 the money for the boys to Forge.

7 Q Who said that?

8 A Cory.

9 Q And did you ask, "What is Forge?"

10 A I did.

11 Q And what did they say?

12 A It was an annuity investor or a structured
13 settlement, what I found out later. But basically
14 what I understood that day was it was an annuity
15 financial company.

16 Q Right.

17 A I had never heard of it before that. I
18 didn't know what that was.

19 Q Okay. And one of the things I'm curious
20 about is: Did Judge Mullen approve that there was
21 going to be a structure to Forge?

22 A Not that I'm aware of.

23 Q But she -- but there was discussion in
24 front of her --

25 A Yes.

Chad Westendorf

1 Q -- that there was going to be a structure?

2 A I guess. I mean, yeah. I mean, I was
3 sitting there in her chambers and we discussed.
4 That was the first time I heard "Forge."

5 Q What was the structure supposed to be?

6 A I have no idea.

7 Q What was the structure supposed to be for
8 Tony?

9 A I don't know.

10 Q What was the structure supposed to be for
11 Brian?

12 A I don't know.

13 Q Well, you saw checks going to Forge.

14 A I did not.

15 Q At various times, did you not --

16 A I did not see those.

17 Q You never saw any checks going to Forge?

18 A I never saw a check going to Forge.

19 Q But if a structure was being -- we're told
20 that you were brought on because Alec told Tony that
21 there were going to be business issues with some
22 settlements coming in, and it would be better for
23 somebody like you, Mr. Westendorf, who has a
24 business background, to handle that.

25 Is that something that you remember

Chad Westendorf

1 hearing?

2 A No, sir.

3 Q Did you ever ask why I'm coming onboard
4 and why Tony is going out?

5 A I did not.

6 Q Okay. So when you heard "Forge," did you
7 not say to yourself, "Hey, what structure is going
8 to be -- there's two boys here. Is there a
9 structure for one and not the other, or both?" Did
10 you ever ask that?

11 A I did not.

12 Q Did anybody ever tell you, on
13 December 18th, that one of your heirs that
14 represent -- that was an heir of the estate, was a
15 vulnerable adult?

16 A On the 19th, they did.

17 Q Who told you?

18 A Alec mentioned that.

19 Q To whom? Judge Mullen?

20 A The conversation in there that day.

21 Q What did he say?

22 A He said that -- like you said, he was a --
23 I don't know. I can't remember exact words, so I
24 don't want to say, but he made it aware that he had
25 special needs.